

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
FORT WAYNE DIVISION**

JERMAYNE WILLIAMS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CAUSE NO.
	)	
ALLEN COUNTY SHERIFF,	)	
MICHAEL STUMP, GARY APPS,	)	
KYLE POOR, KEVIN DALMAN,	)	
CHAD REEVES, AARON WYMER,	)	
SCOTT SANDERSON and	)	
VANCE PRUDEN,	)	
	)	
Defendants.	)	

**COMPLAINT**

Plaintiff, by counsel, alleges against the Defendants as follows:

1. The Plaintiff is Jermayne Williams who served a Notice of Tort Claim upon the Allen County Sheriff on or about September 9, 2019, a copy of which is attached hereto, made a part hereof, and incorporated herein as Exhibit “A”.
2. Defendants include:
  - a. Allen County Sheriff who is named in his representative capacity as the employer of the individually-named Defendants whose actions, conduct, and omissions caused the Sheriff to be liable under the tort laws of the State of Indiana;
  - b. Defendants Michael Stump, Gary Apps, Kyle Poor, Kevin Dalman, Chad Reeves, Aaron Wymer, Scott Sanderson, and Vance Pruden are Allen County Sheriff’s Department employees who were acting as persons under

color of law and are sued in their individual capacities for using excessive force upon the Plaintiff, and/or for failing to intervene and prevent excessive force from being used upon the Plaintiff when they had a meaningful opportunity to do so. Against these Defendants, this Complaint is brought under the Fourteenth Amendment of the United States Constitution and 42 U.S.C. § 1983.

3. As a result of the excessive force of the individual officer Defendants, Plaintiff suffered a fist punch to his face by Michael Stump which resulted in a broken tooth and bleeding from his mouth, as well as physical pain and difficulty breathing.
4. Plaintiff requested medication for pain, but was instead given medication meant for a neighboring inmate, and this wrong medication caused Plaintiff to become nauseous, caused his heart to race, and did nothing for his tooth pain.
5. The individually-named Defendants are liable for excessive force and denial of substantive due process under the Fourteenth Amendment of the United States Constitution (as Plaintiff was a pretrial detainee while in the Allen County Jail), and the individual Defendants are liable for battery against the Plaintiff. The individually-named Defendants are liable for the use of excessive force, or allowing the use of excessive force on Plaintiff when they had a meaningful opportunity to intervene, but failed to do so.
6. Plaintiff alleges that he was damaged and injured as a result of the beating he received at the Allen County Jail, including physical pain, mental anguish, a broken tooth, bleeding from his mouth, and receiving the wrong medication which caused

him to become nauseous and his heart to race. These damages and injuries were intentionally and purposely inflicted by the Defendants warranting in imposition of both compensatory and punitive damages.

WHEREFORE, Plaintiff prays for judgment against the Defendants for compensatory damages, punitive damages, reasonable attorney's fees and costs, and for all other just and proper relief in the premises.

**JURY DEMAND**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury in this action.

Respectfully submitted,

**CHRISTOPHER C. MYERS & ASSOCIATES**

/s/ Christopher C. Myers

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